

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE TRANSPARENCY PROJECT,	§	
	§	
Plaintiff,	§	CIVIL ACTION No. 4:20CV467
	§	
v.	§	
	§	
U.S. DEPARTMENT OF JUSTICE, et al.,	§	JUDGE SEAN D. JORDAN
	§	
Defendants.	§	

**DEFENDANT FEDERAL BUREAU OF INVESTIGATION’S**  
**PROPOSED PRODUCTION SCHEDULE**  
**IN RESPONSE TO THE COURT’S ORDER [ECF 35]**

Defendant Federal Bureau of Investigation (“FBI”) files this Proposed Production Schedule in response to the Court’s Order. [ECF 35].

**FOIA Requests 1469375-000, 1421854-000 & 1468312-000**

As set forth in the Second Declaration of Michael G. Seidel, attached as Exhibit A, the FBI proposes the following production schedule regarding the first three requests:

With respect to Plaintiff’s FOIA request 1469375-000, regarding records pertaining to surveillance of Edward Butowsky and Matt Couch, the FBI proposes to process the three (3) pages responsive to this request within thirty (30) days of this filing.

With respect to Plaintiff’s FOIA requests 1421854-000 and 1468312-000, regarding records referencing Imran Awan, et al., in connection with the mishandling of computer systems and electronic equipment, including records being provided in *Judicial Watch, Inc.*, 18-cv-02563 (DDC), the FBI proposes to continue to provide releases to Plaintiff on or about the 27<sup>th</sup> of each month, until processing in that case is complete.

The FBI estimates that there are approximately 12,180 pages left within the scope of the Judicial Watch request and estimates that it will complete processing in approximately 25 months.

When production is complete, the FBI proposes that the parties meet and confer to discuss the details of a scheduling order for the briefing phase of the litigation, if necessary.

**FOIA Request 1469813-000**

With respect to Plaintiff's FOIA request 1469813-000, regarding records relating to alleged hacking of Democratic National Committee (DNC) emails, the FBI has thus far identified approximately 495,862 pages responsive to this request. The FBI proposes to begin processing this request at a rate of 500 pages per month within (90) days of this filing. [Exhibit A: Declaration of Michael G. Seidel].

The FBI acknowledges that there is no practical way to process the universe of nearly 500,000 documents at issue in FOIA request 1469813-000 in a time frame that is manageable in this lawsuit. The only practical solution is for Plaintiff to narrow the scope of his request to reduce the universe of potentially responsive documents. The FBI proposes that the Court order the parties to negotiate to reduce the volume of material responsive to this request.

Respectfully submitted,

NICHOLAS J. GANJEI  
ACTING UNITED STATES ATTORNEY  
/s/ Andrea L. Parker  
ANDREA L. PARKER

Assistant United States Attorney  
Texas Bar No. 00790851  
550 Fannin St. Suite 1250  
Beaumont, Texas 77701-2237  
Tel: (409) 839-2538  
Fax: (409) 839-2550  
Email: [andrea.parker@usdoj.gov](mailto:andrea.parker@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2021, a true and correct copy of the foregoing document was filed electronically with the court and has been sent to counsel of record via the court's electronic filing system.

/s/ *Andrea L. Parker*  
ANDREA L. PARKER  
Assistant United States Attorney